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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY *et al.*,
Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
corporation,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF MICHELLE WOODHOUSE
ISO PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL SHOULD BE
SEALED [DKT. 589]**

1 I, Michelle Woodhouse, hereby declare:

2 1. I am an Associate General Counsel for Defendant Meta Platforms, Inc. (“Meta”).
3 I provide this Declaration based on my personal knowledge and/or after a reasonable investigation
4 of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

5 2. Pursuant to Civil L.R. 79-5(f)(3), I make this Declaration in support of Plaintiffs’
6 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (Dkt. 589)
7 regarding documents filed with Plaintiffs’ Cover Letter, (*see* Dkt. 588).

8 3. In accordance with the Court’s guidance (*see, e.g.*, Dkt. 570) and for the reasons
9 detailed herein, Meta seeks leave to file under seal portions of certain documents filed with
10 Plaintiffs’ Cover Letter as set forth in the chart below:

Document	Sealing Request
Woodhouse Ex. 1 – Appendix A (Dkt. 589-1)	Redacted Portions

11 4. Meta seeks the Court’s permission to file under seal discrete portions of **Woodhouse**
12 **Exhibit 1**, as further explained below.

13 5. Meta respectfully requests the Court’s permission to redact limited portions of
14 **Woodhouse Exhibit 1**, which is Appendix A to Plaintiffs’ Cover Letter, that reflect confidential
15 third-party identities subject to non-disclosure obligations. Disclosure of third-party identities
16 subject to non-disclosure obligations would put the third parties’ confidential information at risk
17 and pose a competitive disadvantage to Meta and the third parties who obtained promises of
18 confidentiality from Meta for this information and who are not parties to this lawsuit. Additionally,
19 certain of this information is relevant to ongoing and/or future business discussions. Disclosure of
20 such information risks competitive harm to Meta, including by hampering Meta’s third-party
21 relationship management. Meta has limited its proposed redactions to those necessary to mitigate

1 the aforementioned harms, while maintaining the public's access to information with potential
2 relevance to the merits of the case. Meta has previously requested to seal documents based on
3 similar information concerning third parties, (*e.g.*, Dkt. 391-1 ¶ 6; Dkt. 409-1 ¶ 12), which this
4 Court has granted, (*e.g.*, Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409); Dkt. 570). To
5 the extent the Court believes that any third-party information covered by the proposed redactions
6 should be made public, Meta requests that the Court allow these third parties an opportunity to put
7 in their own declaration justifying confidentiality.

* * *

1 I declare under penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct.

3 Executed in San Jose, California on this 14 day of May 2025.

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5 Michelle Woodhouse
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